

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION**

UNITED STATES OF AMERICA

v.

SHABBA LARUN CHANDLER,

Defendant

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Case No.: 4:18-CR-00011-MFU-RSB

MOTION TO DISMISS

COMES NOW, the Defendant, Shabba L. Chandler (the “Defendant”), and hereby moves this Court to dismiss the superseding indictment against him. The reasons for the Defendant’s Motion to Dismiss are stated more fully in the accompanying memorandum in support.

WHEREFORE, the Defendant Shabba L. Chandler, respectfully requests that the Court grant his Motion to Dismiss and enter an Order:

1. Dismissing the Superseding Indictment; or, in the alternative entering an Order protecting the defendant from the outrageous and damaging errors, mistakes, omissions, and oversights of the United States, whether intentional or not. The alternatives proposed by the defendant include [1] excluding the testimony of any and all witnesses on behalf of the United States which are associated with the misbehavior of the government; or [2] dismissing certain charges against the defendant as a sanction for the United States misbehavior. The defendant has no idea at the time of this filing what further and other evidence, exculpatory or not, may be produced by the United States;

2. Granting the Defendant any other and further relief as the Court deems necessary and appropriate.

Respectfully submitted,

SHABBA LARUN CHANDLER

By: /s/ Jeffrey Laing Dorsey
Of Counsel

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 20th of October 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and the foregoing was electronically transmitted through the CM/ECF system to the following CM/ECF participants:

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